



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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TELE: (419) 352-8461 FAX: (419) 352-8468
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Richland County
Compliance Evaluation Inspection
Mansfield Graphics
OHD 004 186 433
Return to Compliance

March 31, 2008

Mr. Jason C. McCarney, General Manager
Mansfield Graphics
127 North Walnut Street
Mansfield, Ohio 44902

Dear Mr. McCarney:

Thank you for your February 8, 2008, response to Ohio EPA's Notice of Violation (NOV) letter dated January 28, 2008. This NOV was issued to address a violation found during Ohio EPA's compliance evaluation inspection (CEI) conducted at your facility located at 127 North Walnut Street, Mansfield, Ohio, on December 6, 2007.

The information you submitted has been reviewed and it reveals that Mansfield Graphics (MG) has abated the violation discovered during the December 6, 2007, inspection as follows:

1. OAC Rule 3745-52-11 - Hazardous Waste Determination

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

MG failed to have waste evaluation documentation for the fluorescent bulbs generated at the facility.

MG is currently disposing of their fluorescent bulbs in the trash. MG must cease disposing of their fluorescent bulbs as non-hazardous waste in the local landfill until a proper waste evaluation has been completed.

The waste evaluation can be conducted by taking a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. MG must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs.

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MG must sample the fluorescent bulbs to determine the Toxicity Characteristic Leaching Procedure (TCLP) concentrations of barium (D005), cadmium (D006), lead (D008), and mercury (D009) as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. MG may run total concentrations for these constituents as a screening tool. If the concentration(s) are detected for any of these constituents at or above the regulatory limit, a TCLP may be required to ensure these constituent(s) are not present above the Ohio EPA regulatory level.

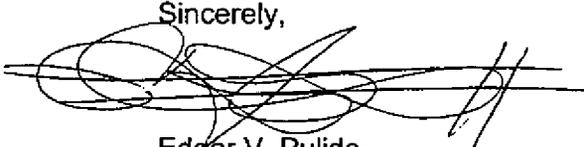
If the bulbs are determined to be hazardous through a proper waste evaluation, MG will have to manage their bulbs either as **1) a universal waste (OAC Chapter 3745-273), or 2) As a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). MG may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.**

In lieu of conducting a waste evaluation, MG may choose to manage their bulbs as a universal waste as outlined in OAC Chapter 3745-273. Please consult the fact sheet "Universal Waste Rules for Handlers of Lamps" given to you during the investigation for more information. If you choose this option, please provide me an outline of your universal waste management plan.

You stated that you have set up a contractual agreement with Gross Electric, Inc. to pick up your spent light bulbs as universal waste. Please be aware of the universal waste storage requirements as illustrated in the guidance documents I provided you during the December 6, 2007 inspection. *This violation has been abated.*

Should you have any questions, please feel free to contact me at (419)373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

pc: Colleen Weaver, Supervisor, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO File: Mansfield Graphics, Inc., Richland County
ec: Ed Pulido, DHWM, NWDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.
